

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

J.M. WOODWORTH RISK RETENTION
GROUP, INC.,

Plaintiff,

-against-

WYCKOFF HEIGHTS MEDICAL CENTER,
AKELLA CHENDRASEKHAR, M.D. and,
LUIS RIVERA, Administrator of the ESTATE
of CARMEN OTERO, Deceased,

Defendants.

QUALIFIED PROTECTIVE
ORDER

Civil Action No. CV 13 0750

WHEREAS plaintiff, J.M. WOODWORTH RISK RETENTION GROUP, INC. ("Plaintiff"), has served upon defendant WYCKOFF HEIGHTS MEDICAL CENTER ("Covered Entity") its Request for Production dated May 30, 2013 ("Demand"); and

WHEREAS the Demand calls for the production of materials that may contain protected health information ("PHI") afforded privacy under the Health Insurance Portability and Privacy Act ("HIPAA") from the Covered Entity; it is

ORDERED pursuant to the Privacy Rules implemented by HIPAA at 45 C.F.R. § 164.512 (e) as follows:

1. The parties and/or their respective counsel are hereby permitted to obtain PHI from the Covered Entity.
2. The parties and/or their respective counsel are prohibited from using any PHI obtained with this Qualified Protective Order for any purpose other than this litigation.

3. Any PHI disclosed pursuant to Plaintiff's Demand for Production dated May 30, 2013 shall not be included within any electronic filings with the Court.
4. The parties and/or their respective counsel are prohibited from sharing any PHI obtained with this Qualified Protective Order with any individuals or entities other than for the purpose of this litigation.
5. At the end of this litigation (including any and all appeals), the parties and/or their respective counsel will either return any PHI in their possession to the Covered Entity or destroy the PHI (including all copies made).

DATED: January 31, 2014

BY THE COURT:

____/s/_____